

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHNATHAN CRAFT, et al.

Defendant.

Case No. **19-cr-1631 (DHU)**

**UNOPPOSED
MOTION TO EXTEND DEADLINE FOR THE FILING OF DEFENSE
OBJECTIONS TO THE PRESENTENCE INVESTIGATION REPORT**

COMES NOW, Defendant JOHNATHAN CRAFT, by his appointed CJA counsel, Barry G. Porter, and respectfully requests that this Court enter an order continuing the current deadline for filing objections to the PSR report.

In support of this Motion, Counsel states as follows:

1. Mr. Johnathan Craft entered into a plea agreement with the government in this matter on July 13, 2023. (Doc. 577). At the plea hearing the court ordered that a presentence report be prepared.
2. On September 28, 2023, the U.S. Probation office filed its initial Presentence Investigation Report. (Doc. 595).
3. Defense counsel filed a Notice of Unavailability for proceedings in this matter on June 21, 2023. The notice outlined that undersigned counsel would be out of the country and unavailable to work on this case from September 11, 2023, to October 13, 2023. (Doc 562).

4. The current deadline for filing a defense response to the PSR is October 18, 2023. Defense counsel is set to meet with Mr. Craft on Thursday, October 19, 2023, to review the PSR. Thereafter, defense counsel will need additional time to draft objections to the PSR. Counsel anticipates that he will be able to file any pertinent objections to the PSR by October 30, 2023.

5. AUSA Letitia Simms was contacted by email and indicated she had no objection to the extension of the deadline for filing PSR objections as requested.

WHEREFORE, defense counsel respectfully requests that the Court enter an order granting an extension of the time to file objections to the PSR to October 30, 2023.

Respectfully Submitted,
BURGESS & PORTER LAW, LLC

/s/ Barrett (Barry) G. Porter

I hereby certify that the foregoing Document was served electronically through the CM/ECF system, which caused electronic service of this document upon the assigned AUSA and all other parties in this matter.

/s/ Barrett (Barry) G. Porter

Barrett G. Porter, Counsel for Defendant

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